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Attorney for Debtor
 Sonia Lopez

UNITED STATES BANKRUPTCY COURT
 EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION

In Re:
 SONIA LOPEZ

Debtor

Case No. 23-10947-A-13F

Chapter 13

SONIA LOPEZ

Plaintiff

Adversary No. 23-01039

Unified Mortgage Service, Inc.; and Brilena,
 Inc.; and Michael Bumbaca and Adele
 Bumbaca; and Equity Trust Company
 Successor in Interest to First Regional
 Bank as Custodian FBO Robert Pastor IRA
 Acct. No 051236; and Equity Trust
 Company as Custodian FBO Charles A.
 Gurule Jr. IRA Account #T058685; and
 Robert C. Edwards; and Equity Trust
 Company Custodian FBO Robert B. Pastor
 IRA Account#T058686; and Capital Benefit)
 Mortgage, Inc.

Defendants

JOINT REPORT OF PARTIES' DISCOVERY
 CONFERENCE

STATUS CONFERENCE

DATE: November 30, 2023

TIME: 11:00 AM

PLACE: Dept. A. Ctrm 11, 5th Flr

US Courthouse

2500 Tulare St., Fresno, CA

JUDGE: Hon. Jennifer E. Niemann

Plaintiff and Defendants, by and through their respective undersigned counsel,
 hereby submit the following Joint Status Conference Statement:

1 1. Plaintiff's complaint was filed on September 21, 2023. An Answer to this
2
3 Complaint was filed on October 19, 2023. An Amended Answer was filed by Defendants,
4 except Capital Benefit Mortgage, Inc., on October 20, 2023.

5 2. An Order to Show Cause regarding Defendant's failure to file Corporate
6 Disclosure Statements is set to be heard on November 30, 2023.

7 3. Discovery Conference. The undersigned have conferred telephonically pursuant
8 to Rule 26 and have discussed initial disclosures.
9

10 4. Settlement. The parties have not yet discussed settlement. Each is amenable to
11 doing so and will also explore and consider mediation.

12 5. Discovery Plan: The parties acknowledge that much of the documentary
13 evidence to be relied on in this case is already found in the court records for each of Plaintiff's
14 prior bankruptcy cases, including the current one. The parties also suggest that it makes sense to
15 limit discovery to one set of Interrogatories, Request for Admissions and Request for Production
16 for Defendants as a unit to avoid repetitive and/or duplicative discovery requests from each of
17 the Defendants. Conversely, in view of the blanket denial provided in Defendants' Answer,
18 Plaintiff will be allowed to propound interrogatories pursuant to FRBP 7033(a) (1) in excess of
19 25 but no more than 50 without further leave of Court. The parties submit the following
20 discovery schedule, subject to the approval of the Court:
21
22

23 a. Initial Disclosures pursuant to FRCP 26(a)(1)(A)-December 29, 2023

24 b. Disclosure of Experts and Expert Witness Reports- February 16, 2024

25 c. Close of Fact Discovery-April 5, 2024

26 d. Deadline for Dispositive Motions-May 20, 2024
27
28

e. Plaintiff's Pre-Trial Statement May 28, 2024

f. Defendants' Pre-Trial Statement June 4, 2024

g. Pre-Trial Conference June 11, 2024

Dated: November 25, 2023

SILVEIRA LAW OFFICES

By/s/ Susan D. Silveira
Susan D. Silveira, Plaintiff

Dated November 25, 2023

LAW OFFICES OF EDWARD T. WEBER

By:/s/Edward T. Weber (per email authorization)
Edward T. Weber, Defendants